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**UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEW JERSEY**

In Re: Choates G. Contracting, LLC Debtor(s).	Case No.: 21-13085-ABA Hearing Date: Chapter 11 Judge: Altenburg
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**SUPPLEMENTAL CERTIFICATION OF DEBTOR IN SUPPORT OF APPLICATION
FOR RETENTION AS SPECIAL COUNSEL**

I, Darrell Choates, Sr., do hereby certify as follows:

1. I am the principal of the Debtor, familiar with the facts set forth herein and authorized to make this certification.
2. Following the filing of my application for retention, the United States Trustee's Office and Drexel Properties, GP / Philly Properties, GP by and through their counsel submitted unofficial objections to the retention of Brad Sclar as special counsel to the Debtor as well as personal counsel to me. This statement is submitted to address those concerns.
3. Prior to the filing of the instant bankruptcy case, I had no contact with Brad Sclar – either personally or through an entity that I own or control. Mr. Sclar was referred to me by Daniel Reinganum, the Debtor's bankruptcy counsel.
4. I am not a creditor of the Debtor and I do not intend to be a creditor of the Debtor (such as by lending money to the Debtor). Moreover, I am committed to seeing the Debtor successfully reorganize – which means that my interests and the Debtors are aligned.
5. As such, I do not hold an adverse interest to the Estate.
6. Moreover, the Debtor has its own counsel in McDowell Law, PC to safeguard the Debtor in the event that there was a concern that I was not acting in accordance with my fiduciary obligations to the Debtor.
7. The Debtor and I have separately retained Mr. Sclar – separate retainer agreements and separate billing records.
8. Given all of the above, I believe that there will be a cost savings to the Estate by allowing

Brad Sclar to represent the Estate and Mr. Choates simultaneously, and that there is only a potential conflict of interest between the Estate and myself – not an actual conflict of interest that should lead to disqualification under *In re: Marvel Entertainment Group, Inc.* 140 F.3d 463.

I certify that the foregoing statements are true under penalty of perjury.

Date: May 18, 2021

BY:

/s/ Darrell Choates, Sr.

Managing Member, Choates
G. Contracting, LLC